

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, :

16 CR. 436 (KMW)

-v-

:

STEVEN BROWN,

:

Defendant.

:

**REPLY AFFIRMATION IN
FURTHER SUPPORT OF
MOTION TO DISMISS COUNTS
ONE, TWO AND FIVE BASED ON
OF STATUTE OF LIMITATIONS**

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WALTER MACK, an attorney duly licensed to practice law before the courts of the State of New York and this court, under the penalties of perjury, affirms and states, based upon my review of records and upon information and belief, as follows:

1. I represent the Defendant Steven Brown in the above-captioned matter. I submit this Reply Affirmation in further support of the Motion to Dismiss Counts One, Two and Five to the Extent the Charges Rely on Conduct Outside the Statute of Limitations.

2. The Court should be aware that the interactions with respect to Victim-1 are completely distinct from any other alleged conduct in the Superseding Indictment as Mr. Brown was the producers of Film-2, developed and owned the script, and was active in casting and on the set. He was also responsible for replacing the director of the film and other personnel matters, unlike any other film project identified in the Superseding Indictment. There was also a final Settlement and Transfer Agreement resolving all disputes with Victim-1 and transferring movie rights to him.

3. For all the reasons set forth in Mr. Brown's moving and reply briefs, he requests that the Court dismiss Counts One, Two and Five of the Superseding Indictment to the Extent the charges violate the five-year statute of limitations.

Dated: New York, New York
February 23, 2018

/s/
Walter Mack, Esq.
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